

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
DIAMOND CHAVANNES,

Plaintiff,

-against-

THE BRONX PARENT HOUSING
NETWORK, INC., VICTOR RIVERA,
CANDIA RICHARDS CLARKE, MARIO
PALUMBO, DANIEL TIETZ, THE CITY OF
NEW YORK, and THE NEW YORK CITY
DEPARTMENT OF HOMELESS SERVICES

Defendants.

Docket No. 21-cv-05060 (JGK)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Attorney's Declaration of Brian S. Sokoloff and the attached exhibit; the accompanying *Memorandum of Law in Support of Defendant's Motion to Dismiss*; and upon all prior pleadings and proceedings, defendant will move this Court before the Honorable John G. Koeltl at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007-1312 on a date and time to be determined by the Court, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing plaintiff's complaint in its entirety with prejudice as against defendant Daniel Tietz, together with such other and further relief as this Court deems just, equitable, and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the October 26, 2021 directive of the Court, answering papers shall be served by February 4, 2022, with reply papers to be served on or before February 18, 2022.

Dated: Carle Place, New York
January 14, 2022

SOKOLOFF STERN LLP

Attorneys for Defendant

Daniel Tietz

By:



Brian S. Sokoloff

179 Westbury Avenue
Carle Place, New York 11514
(516) 334-4500
File No.: 210097

TO: DeTOFFL & GITTELMAN, Attorneys at Law
Attorneys for Plaintiff
125 Maiden Lane – Suite 5C
New York, New York 10038
Tel. (212) 962-2220